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Hearing Date: November 19, 2014
Time: 10:00 a.m.

*Attorneys for Irving H. Picard, Trustee for the
SIPA Liquidation of Bernard L. Madoff Investment
Securities LLC and the Substantively Consolidated
estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY
PROCEEDINGS LISTED ON APPENDIX 1
ATTACHED HERETO,

Defendants.

Adv. Pro. Nos. listed on Appendix 1
Attached Hereto

**TRUSTEE'S STATEMENT REGARDING AMENDMENTS TO EXHIBITS TO
PROPOSED ORDER CONCERNING FURTHER PROCEEDINGS
ON EXTRATERRITORIALITY MOTION AND TRUSTEE'S OMNIBUS
MOTION FOR LEAVE TO REPLEAD AND FOR LIMITED DISCOVERY**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa *et seq.*, and the substantively consolidated estate of Bernard L. Madoff (“Madoff”), individually, by and through his counsel, respectfully submits this statement (“Statement”) submitting amended exhibits A and B to the proposed order (the “Proposed Order”), submitted as Exhibit A to the Notice of Presentment of Order Concerning Further Proceedings on Extraterritoriality Motion and Trustee’s Omnibus Motion for Leave to Replead and for Limited Discovery (Docket No. 8249). In support of this Statement, the Trustee respectfully states as follows:

Introduction

1. Attached to the Proposed Order are Exhibits A and B, which identify the parties seeking to participate in the briefing procedures set forth in the Proposed Order.
2. Specifically, Exhibit A to the Proposed Order identifies the subsequent transferee defendants who participated in the motion to withdraw the reference with respect to extraterritoriality issue before the District Court, and contend that the District Court’s Extraterritoriality Decision requires dismissal of the Trustee’s counts pursuant to Bankruptcy Code Section 550(a)(2), in whole or in part.
3. Exhibit B to the Proposed Order identifies subsequent transferee defendants who did not participate in the motion to withdraw the reference with respect to extraterritoriality issue before the District Court, but contend that the District Court’s Extraterritoriality Decision requires dismissal of the Trustee’s counts pursuant to Bankruptcy Code Section 550(a)(2), in whole or in part.
4. Since the filing of the Proposed Order, the Trustee was contacted by counsel for

certain subsequent transferee defendants that were not included in the original Exhibits A or B to the Proposed Order, but now seek to participate in the briefing procedures set forth in the Proposed Order. The Trustee has conferred with coordinating counsel for the defendants, and neither has any objection to the inclusion of these defendants to the briefing procedures set forth in the Proposed Order.

5. Attached as Exhibit 1 to this Statement is a revised Exhibit A to the Proposed Order adding a new defendant to the schedule.

6. Attached as Exhibit 2 to this Statement is a revised Exhibit B to the Proposed Order adding a new defendant to the schedule.

7. For the convenience of the Court and the parties, attached as Exhibits 3 and 4 are blackline versions of Exhibits A and B, respectively, comparing the proposed revisions to the original exhibits.

Dated: New York, New York
November 18, 2014

Respectfully submitted,

/s/ Regina Griffin
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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and estate of Bernard L. Madoff*

Adversary Proceeding Number	Case Name
09-01154	Picard v. Vizcaya Partners Limited
09-01239	Picard v. Fairfield Sentry Limited
09-01364	Picard v. HSBC Bank plc
09-01365	Picard v. Thybo Asset Management Limited
10-04284	Picard v. Plaza Investments International Limited
10-04285	Picard v. UBS AG
10-04287	Picard v. Cardinal Management
10-04330	Picard v. Square One Fund Ltd
10-04457	Picard v. Equity Trading Fund
10-04471	Picard v. Citrus Investment Holdings Ltd.
10-05120	Picard v. Oreades SICAV
10-05229	Picard v. Defender Limited
10-05286	Picard v. Legacy Capital Ltd.
10-05311	Picard v. UBS AG
10-05345	Picard v. Citibank, N.A.
10-05346	Picard v. Merrill Lynch International
10-05348	Picard v. Nomura Bank International plc
10-05351	Picard v. Banco Bilbao Vizcaya Argentaria, S.A.
10-05353	Picard v. Natixis
10-05354	Picard v. ABN AMRO Bank, N.A.
10-05355	Picard v. ABN AMRO Bank (Ireland) Ltd.
10-05415	Picard v. American Securities Management, L.P.
11-01724	Picard v. Pictet et Cie
11-01725	Picard v. Banque J. Safra (Suisse) SA f/k/a Banque Jacob Safra (Suisse) SA
11-01885	Picard v. Safra National Bank of New York
11-02149	Picard v. Banque Syz & Co., SA
11-02493	Picard v. Abu Dhabi Investment Authority
11-02537	Picard v. Orbita Capital Return Strategy
11-02538	Picard v. Quilvest Finance Ltd.
11-02539	Picard v. Meritz Fire & Insurance Co. Ltd.
11-02540	Picard v. Lion Global Investors Limited
11-02541	Picard v. First Gulf Bank
11-02542	Picard v. Parson Finance Panama S.A.
11-02551	Picard v. Delta National Bank and Trust Company
11-02553	Picard v. Unifortune Asset Management SGR SpA
11-02554	Picard v. National Bank of Kuwait S.A.K.
11-02568	Picard v. Cathay Life Insurance Co. Ltd.
11-02569	Picard v. Barclays Bank (Suisse) S.A.
11-02570	Picard v. Banca Carige S.P.A.
11-02571	Picard v. Banque Privee Espirito Santo S.A.
11-02572	Picard v. Korea Exchange Bank
11-02573	Picard v. Sumitomo Trust and Banking Co., Ltd.
11-02730	Picard v. Atlantic Security Bank
11-02733	Picard v. Naidot & Co.

Adversary Proceeding Number	Case Name
11-02759	Picard v. Nomura International plc
11-02760	Picard v. ABN Amro Bank N.V.
11-02761	Picard v. KBC Investments Limited
11-02762	Picard v. Lighthouse Investment Partners LLC
11-02763	Picard v. Inteligo Bank Ltd.
11-02784	Picard v. Somers Dublin Limited
11-02796	Picard v. BNP Paribas Arbitrage SNC
11-02910	Picard v. Merrill Lynch Bank (Suisse) SA
11-02922	Picard v. Bank Julius Baer & Co. Ltd.
11-02923	Picard v. Falcon Private Bank Ltd.
11-02929	Picard v. LGT Bank in Liechtenstein Ltd.
12-01002	Picard v. The Public Institution For Social Security
12-01004	Picard v. Fullerton Capital PTE Ltd.
12-01005	Picard v. SICO Limited
12-01019	Picard v. Banco Itau
12-01021	Picard v. Grosvenor Investment Management
12-01023	Picard v. Arden Asset Management
12-01046	Picard v. SNS Bank N.V.
12-01047	Picard v. Koch Industries Inc.
12-01048	Picard v. Banco General S.A.
12-01194	Picard v. Kookmin Bank
12-01195	Picard v. Six Sis AG
12-01202	Picard v. Vontobel AG
12-01205	Picard v. Multi Strategy Fund Ltd
12-01207	Picard v. Lloyds TSB Bank plc
12-01209	Picard v. BSI AG
12-01210	Picard v. Schroder & Co.
12-01211	Picard v. Union Securities
12-01216	Picard v. Bank Hapoalim
12-01512	Picard v. ZCM Asset Holding Co
12-01565	Picard v. Standard Chartered Financial Services
12-01566	Picard v. UKFP (Asia) Nominees Ltd.
12-01576	Picard v. BNP Paribas S.A.
12-01577	Picard v. Dresdner Bank
12-01690	Picard v. EFG Bank S.A.
12-01691	Picard v. Banque Degroof SA
12-01693	Picard v. Lombard Odier Darier Hentsch & Cie
12-01694	Picard v. Banque Cantonale Vaudoise
12-01695	Picard v. Bordier & Cie
12-01697	Picard v. ABN AMRO Fund Services (Isle of Man) Nominees Limited
12-01700	Picard v. Caprice International Group Inc.
12-01701	Picard v. RD Trust
12-01702	Picard v. Barreneche, Inc.

APPENDIX 1

ADDITIONAL CASES ADDED

09-01161	Picard v. Federico Ceretti, et al.
10-04336	Picard v. The Estate of Doris Igoïn, et al.
10-04517	Picard v. Radcliff Investments Limited, et al.
10-05267	Picard v. Leon Flax, et al.
10-05411	Picard v. Sonja Kohn, et al.
11-02731	Picard v. Trincaster Corporation
11-02758	Picard v. Caceis Bank Luxembourg, et al.
11-02925	Picard v. Credit Suisse AG, et al.
12-01022	Picard v. Credit Agricole (Suisse) S.A., et al.
12-01025	Picard v. Solon Capital Ltd.
12-01273	Picard v. Mistral (SPC)
12-01278	Picard v. Zephyros Ltd.
12-01513	Picard v. Citivic Nominees Ltd.
12-01669	Picard v. Barfield Nominees Ltd., et al.
12-01676	Picard v. Credit Suisse AG, as successor in interest to Clariden Leu AG and Bank Leu AG
12-01677	Picard v. Societe Generale Private Banking (Suisse) S.A. (f/k/a SG Private Banking Suisse S.A.), et al.
12-01680	Picard v. Intesa Sanpaolo S.p.A. (as Successor in Interest to Banca Intesa SPA), et al.
12-01698	Picard v. Banque Internationale a Luxembourg S.A. (f/k/a Dexia Banque Internationale a Luxembourg S.A.), individually and as successor in interest to Dexia Nordic Private Bank S.A., et al.
12-01699	Picard v. Royal Bank of Canada, et al.